

May 6, 2025

**By ECF**

Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
Court Room 21B  
New York, NY 10007-1312

Re: *Edmar Financial Company, LLC et al v. Currenex, Inc. et al*, Case No. 21-cv-06598

Dear Judge Kaplan:

Pursuant to Your Honor's Individual Rules of Practice, Plaintiffs Edmar Financial Company, LLC, Irish Blue & Gold, Inc., and XTX Markets Limited ("Plaintiffs") and Defendants Currenex, Inc., Goldman Sachs & Co. LLC, HC Technologies, LLC, State Street Bank and Trust Company, and State Street Global Markets International Limited ("Defendants") submit this joint request to modify the Case Management Schedule entered by the Court on August 15, 2024 (ECF No. 143). We attach, as Exhibit A, a joint stipulation and proposed order setting forth the proposed modified schedule. This is the second extension of the schedule requested by the parties.

Several factors have contributed to the slowing of fact discovery in this matter. The volume of structured data produced by the parties has been extraordinarily large, even compared to the large, complex financial cases in which the parties or their counsel previously have been involved. For example, the transactional data produced by Currenex alone amounts to more than 260 terabytes of data. The projects of unpacking and understanding these data have been challenging and time-consuming for the parties. The parties also recently began to receive large volumes of data from third party platforms, which will require substantial effort to unpack and analyze. In addition, Plaintiffs are in the process of producing a significant number of additional responsive documents that Plaintiffs located after the substantial completion deadline for document production. The parties also recently engaged in a mediation, which, although unsuccessful, led to a temporary slow down in discovery. The net result of these factors is that no depositions have yet been taken, and certain depositions may require Hague service.

Accordingly, the parties respectfully request that the discovery schedule be extended to align with these realities. The parties seek a brief extension of four months to the current schedule. The full set of dates are listed in Exhibit A. The proposed modified schedule would allow the parties time to complete fact discovery (including fact depositions) by September 19, 2025, and to complete the expert analyses of Defendants' data and source code so that class certification briefing could begin on November 18, 2025.

We respectfully ask the Court to grant this joint request to modify the case management plan and so-order the contemporaneously joint stipulation and proposed order.

Very truly yours,

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

ROPES & GRAY LLP

*/s/ Daniel L. Brockett*

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*/s/ Alexander B. Simkin*

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*/s/ Carmine D. Boccuzzi Jr.*

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